

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

2016 JAN 15 PM 12:37

**RAFAEL A. OLIVERAS
LÓPEZ DE VICTORIA
Plaintiffs**

Civil Case No. 2015 cv 02324
U.S. DISTRICT COURT
SAN JUAN, P.R.

v.

**NATIONAL REPUBLICAN PARTY;
DONALD TRUMP
Defendants**

MOTION REQUESTING AMENDMENT TO THE COMPLAINT

COMES NOW Plaintiffs, *pro se*, and most respectfully allege and pray before this Honorable Court as follows:

1. Plaintiff, Rafael Oliveras Lopez de Victoria, most respectfully requests from the Honorable Court two (2) amendments to the complaint filed in the instant case.
2. First, it is respectfully requested that allegation number 9 be modified whereby the name of Mrs. Natividad Vazquez be eliminated from said allegation, but asserting the fact that co-defendant, Donald Trump, has discriminated by reason of gender and/or sex with various women throughout the United States. This elimination violates fundamental rights of a person in relation to the United States Constitution and amendments thereof, 14th Amendment as well as the basic tenants of Civil Rights Act of 1964, and amendments thereof.
3. Second, recently, Mr. Donald Trump publicly and with malice, continuously violating humane and civil rights, by attacking the Muslim population in a racist and bigotry manner. This vicious attack by Mr. Donald Trump not only has offended the Muslim population worldwide but also has created a climate of religious intolerance, which

may produce, within the United States of America, social and racial unrest between its populations. Mr. Fareed Zakaria in an editorial before CNN Sunday, December 13, 2015 at around 11:00 a.m. in his televised program *GPS*, he stated unequivocally and serious grounds that Mr. Donald Trump was a racist and bigot; and compared to the Muslim situation with the Jewish situation in early 1930 with the advent of the Nazi party. Said statement coming from a moderate secular Muslim is quite astounding for the same could be prophetic and dangerous. It should be pointed out, that Mr. Fareed Zakaria is a highly respected news anchor at of CNN, editor of the Washington Post, and prior to said job, editor in chief of the Time Magazine. Also, he is an alumnus of Harvard University.

4. Therefore, Mr. Donald Trump has again crossed the line to inflict damage to the Muslim class and has created severe social and religious tensions, which are prohibited by the United States' Constitution. Mr. Donald Trump may be catalogue, not only as a political person, but at this time also a quasigovernmental officer who as a future President must protect the United States Constitution. Attacks to bonafide U.S citizen either by religion, gender, race, age and/or physical or mental disability are not only morally wrong but violate the humane and civil rights of these classes of persons. Thus, his Presidential candidacy as truly tainted from respect to the United States Constitution and Civil Rights Act of 1964.
5. On the basis of the above, it most respectfully requested that the original complaint be amended and modified accordingly to these above allegations. Enclosed herein it will be found copy of an article written by journalist Brad Wilmourth whereby Mr. Fareed Zakaria.

WHEREFORE, in light of the above, it most respectfully requested that the original complaint be amended and modified accordingly to these above allegations. Enclosed herein it will be found a copy of an article written by journalist Brad Wilmourth, whereby excerpts from Mr. Fareed Zakaria's show are commented.

RESPECTFULLY SUBMITTED.

In Caguas, Puerto Rico, at this January 14, 2016.



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